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PROPOSED COUNSEL FOR DEBTORS

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

IN RE:	§	CHAPTER 11
	§	
NATIONAL RIFLE ASSOCIATION OF AMERICA and SEA GIRT LLC,	§	CASE NO. 21-30085-hdh11
	§	
DEBTORS¹	§	Jointly Administered

MOTION FOR EXPEDITED CONSIDERATION

The National Rifle Association of America and Sea Girt LLC (collectively, the “Debtors”) file this motion to request expedited consideration of the following matters:

Debtors’ Motion for Authority to Honor Prepetition Obligations Related to Customer, Donor and Member Programs (the “Customer Program Motion”) [Docket No. 76]

Debtors’ Motion for Approval of Certain Notice and Confidentiality Procedures (the “Notice Motion”) [Docket No. 77]

Debtors’ Motion for Waiver of the Requirements of Section 345(b) (the “345(b) Motion”) [Docket No. 78]

¹ The last four digits of the Debtors’ taxpayer identification numbers are: 6130 (NRA) and 5681 (Sea Girt). The Debtors’ mailing address is 11250 Waples Mill Road, Fairfax, Virginia 22030.

Specifically, the Debtors request that the foregoing motions be set at the next omnibus hearing in this case, which is scheduled for February 10, 2021 at 2:00 p.m. (CT). The Debtors require expedited consideration of the foregoing motions (i) to ensure that they may continue to honor certain critical obligations related to the customer, donor, and member programs as described in the Customer Program Motion in a timely manner; (ii) to ensure that the notice and confidentiality issues discussed in the Notice Motion may be addressed prior to the February 15, 2021 deadline to file schedules and statements of financial affairs and the Section 341 meeting on February 22, 2021; and (iii) because the interim order temporarily waiving the requirements of Section 345(b) with respect to the investment accounts described in the Section 345(b) Motion currently expires on February 10, 2021.

Accordingly, the Debtors request that the Court schedule the foregoing motions for hearing on **February 10, 2021 at 2:00 p.m. (CT)**.

Dated: January 28, 2021

Respectfully submitted,

/s/ Patrick J. Neligan, Jr.
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